

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America

v.

CELSO MARTINEZ-ORTIZ

Case No. 25-mj-1114

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 26, 2025 in the county of Wilson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Title 8, United States Code
Sections 1326(a)

Illegal Re-entry

Offense Description

This criminal complaint is based on these facts:

See Attached statement in support of complaint

☒ Continued on the attached sheet.

/s/ John Quinn Bolls, Jr.

Complainant's signature

Deportation Officer John Quinn Bolls, Jr., ICE

Printed name and title

Sworn to me remotely by telephone, in compliance with
Fed. R. Crim. P. 4.1.

Date: 03/19/2025

City and state: Nashville, Tennessee

Barbara D. Holmes

Judge's signature



Hon. Barbara D. Holmes, U.S. Magistrate Judge

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, John Quinn Bolles Jr. having been duly sworn, hereby depose and swear to the following:

1. I, John Quinn Bolles Jr., am an Agent with the Department of Homeland Security, specifically the U.S. Immigration and Customs Enforcement Agency, currently assigned to the Middle District of Tennessee. I have been so employed since September 2007. As a federal agent for the Department of Homeland Security, I am familiar with federal statutes, including: 8 U.S.C. § 1326(a), which makes it unlawful for an individual who has previously been deported from the United States to enter the United States without the inspection, admission, parole, or permission of the appropriate federal authorities.

2. The facts contained in this affidavit are based on first-hand knowledge or information learned during this investigation from law enforcement sources or from witnesses. This affidavit does not contain each and every detail known by me regarding this investigation. Instead, this affidavit provides information necessary to establish probable cause to arrest Celso MARTINEZ-Ortiz for a violation of 8 U.S.C. § 1326(a). Except where indicated, all statements referenced herein are set forth in substance and in part, rather than verbatim.

3. On or about November 22, 2024, officers with the Lebanon Police Department (LPD) executed a search warrant on a residence in Lebanon, Tennessee. This residence is located in the Middle District of Tennessee. During a search of the residence and vehicles parked at the residence, law enforcement found distribution quantities of controlled substances, numerous firearms, narcotic mixing agents, and over \$10,000 in U.S. currency.

4. LPD officers conducting the residential search also found a Mexican passport belong to MARTINEZ-Ortiz inside a bedroom of the residence. This bedroom also contained a Glock 43 9mm pistol.

5. On or about February 19, 2025, an immigration records check showed that MARTINEZ-Ortiz is a Mexican citizen and has no authorization to enter or remain in the United States. Immigration records reflect that MARTINEZ-Ortiz was encountered by U.S. Border Patrol agents in November of 2009. MARTINEZ-Ortiz was then removed from the United States on or about November 29, 2009, to Mexico via Nogales, Arizona.

6. On or about February 26, 2025, LPD detectives observed MARTINEZ-Ortiz at the above-described residence in Lebanon.

7. Immigration records reflect that MARTINEZ-Ortiz has not received express consent from the United States Attorney General or the Secretary of Homeland Security to reapply for admission into the United States since his last removal. Immigration records show no pending applications with the Citizenship and Immigration Services. MARTINEZ-Ortiz does not appear to be eligible for any relief under the Immigration & Nationality Act (INA), as amended.

8. Therefore, I am requesting a warrant authorizing the arrest of Celso MARTINEZ-Ortiz for a violation of 8 U.S.C. § 1326(a).